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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION
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5 :
6 In Re: :
7 : Civil Action No.
8 ALTA MESA RESOURCES, INC., :
9 SECURITIES LITIGATION : 4:19-CV-00957
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10 VIDEO-RECORDED ORAL DEPOSITION OF

11 Expert Witness

12 TAYLOR J. KIRKLAND

13 November 15, 2023

14 9:14 a.m.

15 4550 Travis Street
16 Dallas, Texas 75205
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23 Stenographically Reported by:

24 MAYLEEN AHMED, RMR, CRR, CRC, TX-CSR #9428

25 Job No.: 6306381

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1 A. Correct.

2 Q. Why didn't you review the financial data
3 at -- from AMH/AMR about the installation and
4 operation of ESPs?

5 A. I tried to. I asked for it. But the
6 data that was required for that, I don't believe we
7 could get it from the production, from -- from the
8 document production.

9 Q. And what did you do to understand that
10 the financial data, necessary to analyze whether
11 ESPs were economic at Alta Mesa, was not obtainable
12 through the production you had access to?

13 MR. SHER: Objection.

14 A. I'm sorry. Could you ask that -- are
15 you asking when I knew that? Or what was --

16 Q. What did you do to understand that the
17 financial data, necessary to analyze whether --
18 whether or not ESPs were economic at Alta Mesa, was
19 not obtainable through the productions that you had
20 access to?

21 A. I did a significant amount of searching
22 in the data production, as well requested from
23 Entwistle & Cappucci help on -- on locating that,
24 and we were unable to do so.

25 MR. PETERS: I'd like -- let's go off

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